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5 Attorneys for Defendant
6 ROBERT CHARLES CRIST

7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE EASTERN DISTRICT OF CALIFORNIA

9
10 UNITED STATES OF AMERICA,) Case No. 2:22-cr-00229-DJC
11 Plaintiff,)
12 vs.) STIPULATION AND [PROPOSED] ORDER TO
13) ADOPT AMENDED LANGUAGE FOR SPECIAL
14) CONDITIONS OF RELEASE # 2
ROBERT CHARLES CRIST) Date: July 21, 2023
Defendant.) Time. 2:00 P.M.
) Judge: Hon. Allison Claire
15 _____)

16 Following the court hearing on the defendant's Motion to Modify Conditions of Release
17 (CR 48, 51), IT IS HEREBY STIPULATED by and between the parties hereto through their
18 respective counsel, U.S. Attorney Phillip A. Talbert, through Assistant United States Attorney
19 Emily Sauvageau, attorney for Plaintiff, and Federal Defender Heather Williams, through
20 Assistant Federal Defender Hannah Labaree, attorney for defendant Robert Charles Crist, that
21 the following language amending Special Condition #2 be adopted. The proposed language is in
22 **bold**.

23 Pretrial Services Officer Stephanie Mott concurs in this request.

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You must not possess, have in your residence, or have access to a firearm/ammunition, destructive device, or other dangerous weapon; additionally, you must provide written proof of divestment of all firearms/ammunition currently under your control. **One exception to this condition is that the defendant is permitted to possess the following archery equipment: one “Mathews Switchback” compound bow and one “Xpedition Escape” compound bow, as well as a maximum of 12 arrows. This equipment must be stored securely in a designated place in the defendant’s home, as approved by Pretrial Services. The equipment may be removed only for use when hunting and must be returned as soon as possible upon the completion of its use in a hunting expedition. The equipment must never be left outside of the designated place in the defendant’s home or, while in transit to and from a hunting expedition, must never be left unattended in a vehicle.**

Respectfully submitted,

Dated: July 21, 2023

HEATHER E. WILLIAMS
Federal Defender

/s/ Hannah Labaree
HANNAH LABAREE
Assistant Federal Defender
Attorney for Defendant
Robert Charles Crist

Dated: July 21, 2023

PHILLIP A. TALBERT
United States Attorney

/s/ Emily Sauvageau
EMILY SAUVAGEAU
Assistant U.S. Attorney
Attorney for Plaintiff

ORDER

IT IS HEREBY ORDERED, the Court, having received, read, and considered the parties' stipulation, and good cause appearing therefore, adopts the parties' stipulation in its entirety as its Order. The proposed language amending Special Condition #2 is hereby adopted.

Dated: July 21, 2023


ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE